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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WENDY CHOWNING, individually and on behalf of all others similarly situated,

Plaintiff,

v.

KOHL'S DEPARTMENT STORES, INC., a Delaware Corporation; KOHL'S CORPORATION; and DOES 1 through 20, inclusive,

Defendants.

CASE NO. 2:15-cv-8673-RGK-SP

CLASS ACTION

PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR CLASS CERTIFICATION

Date: March 21, 2016
Time: 9:00 a.m.
Judge: Hon. R. Gary Klausner
Crtrm: 850

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on March 21, 2016, at 9:00 a.m., or as soon thereafter as the matter may be heard, in Courtroom 850 of the above-entitled Court located at 255 E. Temple Street, Los Angeles, California 90012, Plaintiff, Wendy Chowning, individually and on behalf of all others similarly situated, will move this Court for an Order certifying the following class ("the Class") pursuant to Federal Rules 23(a) and 23(b)(3):

> All persons who, while in the State of California and between July 21, 2011 and the present (the "Class Period"), purchased from Kohl's one or more private or exclusive branded items at a discounted "sale" price of 30% or more below a stated "Original" or "Regular" price and who have not received a full refund or credit for their purchase.

> Excluded from the Class are Kohl's, its past and present officers, employees, agents or affiliates, and any judge who presides over this action.

Plaintiff also seeks to be appointed class representative and to have her counsel appointed class counsel pursuant to Rule 23(g)(1).

Plaintiff bases her motion on this notice of motion and motion, the accompanying Memorandum of Points and Authorities, Plaintiff's Evidence in Support of Motion for Class Certification, the Declaration of Matthew J. Zevin, the Declaration of Derek J. Emge, the Declaration of George T. Stiefel, the Declaration of Brian Bergmark, the Declaration of Dhruv Grewal, Ph.D., and all pleadings and records on file herein.

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This motion is made following the conference of counsel pursuant to L.R. 7-3 which took place on December 28, 2015 and via subsequent correspondence.

Dated: February 2, 2016

STANLEY LAW GROUP

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